

EXHIBIT A

DEFAULT JUDGMENT MOTION COVER SHEET

MDL MOVING PAPERS

Motion: ECF No. _____

Memorandum of law: ECF No. _____

Declaration & supporting exhibits: ECF No. _____

PLAINTIFFS

Please describe each set of plaintiffs requesting judgments in this motion.

Exhibit	Description of Plaintiffs	Cause(s) of Action

DEFENDANTS

Please list all defendants the plaintiffs are moving against:

COMPLIANCE

As stated in ECF No. _____ at ¶_____, counsel followed the quality control measures outlined in ECF No. 3433 and adopted in ECF No. 3435.

As stated in ECF No. _____ at ¶_____, these plaintiffs have not previously received judgments against these defendants.

Excel versions of any tables attached to the proposed order were emailed to
Netburn_NYSDChambers@nysd.uscourts.gov on ____ / ____ / _____. see Liability Judgment on page 2

SUBJECT MATTER JURISDICTION

The Court previously addressed subject matter jurisdiction over these claims in ECF No. _____. see Liability Judgment on page 2

The Court has not previously addressed subject matter jurisdiction over these claims. see Liability Judgment on page 2

PERSONAL JURISDICTION

The Court previously addressed personal jurisdiction over these defendants in ECF No. _____. see Liability Judgment on page 2

The Court has not addressed personal jurisdiction over these defendants.

FACTUAL & LEGAL QUESTIONS

This motion requests new functional equivalence findings; new personal injury assessments; or resolution of a new issue: _____

This motion does not raise novel factual or legal issues.

RELEVANT FILINGS

For each member case, list docket entries for the corresponding filings. Duplicate this page if additional space is needed.